

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

Mahmoud KHALIL,

Petitioner,

v.

Donald J. TRUMP, in his official capacity as President of the United States; William P. JOYCE, in his official capacity as Acting Field Office Director of New York, Immigration and Customs Enforcement; Yolanda PITTMAN, in her official capacity as Warden of Elizabeth Contract Detention Facility; Caleb VITELLO, Acting Director, U.S. Immigration and Customs Enforcement; Kristi NOEM, in her official capacity as Secretary of the United States Department of Homeland Security; Marco RUBIO, in his official capacity as Secretary of State; and Pamela BONDI, in her official capacity as Attorney General, U.S. Department of Justice,

Respondents.

Case No. 25-cv-01963
(MEF-MAH)

MOTION TO SEAL

Pursuant to Local Civil Rule 5.3, Counsel for Petitioner in the above-captioned case respectfully submits this motion to seal its June 4, 2025 filing at ECF 281. Specifically, Petitioner seeks an Order pursuant to Local Civil Rule 5.3(c) granting leave to place narrowly tailored redactions over his own personally identifying information and personally identifying information of non-parties. *See* Declaration of Veronica Salama (“Salama Decl.”) Exhibits B, C, G-4, G-11, H-1, H-2, H-3, H-4, H-6, H-7, H-8, H-9, H-10, H-11, H-12, & Q. Petitioner also seeks to maintain a small number of declarations under complete seal; because of these declarants’ unique and recognizable academic positions, only full redaction suffices to safeguard their privacy and shield them from potential harm, including harassment and negative

professional consequences. *See* Salama Decl. Exhibits G-7, G-8, G-9, G-10. Finally, according to the terms of a separate, forthcoming stipulated confidentiality order, Petitioner seeks to seal and designate as “Attorneys’ Eyes Only” the expert psychological report of Dr. Andrew Rasmussen, which consists of private medical information and is highly sensitive in its entirety. Salama Decl. Exhibit O.

Respondents consent to sealing Exhibits B, C, and O, and take no position on the sealing of Exhibits G, H, and Q. With regard to the Declaration of Veronica Salama, which contains descriptions of all exhibits, including the foregoing, the Government incorporates its positions on each individual exhibit.

Submitted with this motion is the Declaration of Liza Weisberg, an Index detailing the materials to be sealed and the basis for their sealing, and a Proposed Order to Seal including Proposed Findings of Fact and Conclusions of Law in accordance with Local Civil Rule 5.3(c) and 7.1(e).

WHEREFORE, Petitioner respectfully requests that the Court grant this Motion and enter an order sealing the Declaration of Veronica Salama and exhibits attached thereto (ECF No. 281).

Date: June 9, 2025

Respectfully submitted:

/s/Liza Weisberg
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